

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Anthony Muni	:	Chapter 13
Angela Muni	:	Case No. 22-10396-ELF
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY TOYOTA MOTOR CREDIT CORPORATION

Debtors, Anthony & Angela Muni, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Toyota Motor Credit Corporation hereby submit the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted payments were missed. Debtors ask for the chance to cure the post-petition arrears.
9. Admitted.
10. Admitted.
11. Admitted.
12. Denied. Debtors ask for the chance to cure the post-petition arrears.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: December 6, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Keri P. Ebeck Esq.
Attorney for Movant *Toyota Motor Credit Corporation*
Electronic Notice to *kebeck@bernsteinlaw.com*

Dated: December 6, 2022

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor(s)